

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: TURNER PURNELL, JR.
DEBTOR**

**CASE NO: 17-13158
CHAPTER 13**

RESPONSE TO TRUSTEE'S MOTION TO DISMISS

COMES NOW, the Debtor, TURNER PURNELL, JR., and files his response to the Trustee's Motion to Dismiss showing the court as follows:

Debtor respectfully requests that his Chapter 13 case not be dismissed. Debtor admits that he is behind but will be able to catch up the payments and complete the plan. Debtor also had just cause for the plan payments to get behind.

WHEREFORE, Debtor requests that the court deny the Trustee's Motion to Dismiss, that he be allowed to catch up his payments and for such other and further relief that this court deems just and proper under the circumstances.

Respectfully submitted,
TURNER PURNELL, JR.

BY: /s/William C. Cunningham
William C. Cunningham
Attorney for Debtor

CERTIFICATE OF SERVICE

I, WILLIAM C. CUNNINGHAM, Attorney for the Debtor do hereby certify that I forwarded a true and correct copy of the foregoing Response to the Trustee's Motion to Dismiss by ECF to: Hon. Terre Vardaman at VARDAMAN13ECF@gmail.com and the Office of the U.S. Trustee at USTPRegion0.5.AB.ECF@usdoj.gov.

SO CERTIFIED on this the 10th day of June, 2019.

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/s/William C. Cunningham
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